

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ELIZABETH MOELLER, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

THE WEEK PUBLICATIONS, INC.,

Defendant.

Case No. 22-cv-10666-TLL-PTM

Hon. Thomas L. Ludington

Mag. Judge Patricia T. Morris

**DECLARATION OF ELIZABETH MOELLER IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

I, Elizabeth Moeller, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an adult over the age of 18 and a resident of the State of Michigan. I am the Plaintiff in the lawsuit entitled *Moeller v. The Week Publications, Inc.*, Case No. 22-cv-10666-TLL-PTM, currently pending in the United States District Court for the Eastern District of Michigan. I make this Declaration in support of my Motion for Preliminary Approval of Class Action Settlement. The statements made in this Declaration are based on my personal knowledge and, if called as a witness, I could and would testify thereto.

2. I subscribed to *The Week* magazine directly through Defendant.

3. I assisted with the litigation of this case by detailing my magazine subscription purchase history. Specifically, I described to my lawyers how I subscribed to the magazines at issue and how much I paid. I also informed my counsel that I did not agree in writing or otherwise to allow Defendant to sell or disclose my Personal Reading Information, that I did not receive notice of such disclosures, and that I was unaware of such disclosures entirely.

4. I also worked with my attorneys to prepare the Second Amended Class Action Complaint. I carefully reviewed the Second Amended Complaint for accuracy and approved it before it was filed.

5. I filed this case even though I knew that this case would invariably reveal my statutorily-protected status as a *The Week* subscriber.

6. During the course of this litigation, I kept in regular contact with my lawyers. Specifically, I conferred with them regularly by phone and e-mail to discuss the status of the case. We also discussed case strategy, preparation for document and deposition discovery, mediation, and the prospects of settlement. Furthermore, when appropriate, I informed my attorneys of additional facts for their research and consideration.

7. I also coordinated with my lawyers to search for documents that Defendant may request in formal discovery, such as copies of my magazines, documents concerning my magazine subscription purchases, and junk mailings I

have received. I was also prepared to testify at deposition and trial, if necessary.

8. My lawyers have kept me well informed in regard to the efforts to resolve this matter. I discussed the Class Action Settlement Agreement with them and gave my approval prior to signing it.

9. Throughout this litigation, I understood that, as a putative Class Representative, I have an obligation to protect the interests of other Settlement Class Members and not act just for my own personal benefit. I do not have any conflicts with other Settlement Class Members. I have done my best to protect the interests of other Settlement Class Members and will continue to fairly and adequately represent the Settlement Class to the best of my ability.

I declare under penalty of perjury that the above and foregoing is true and accurate.

Executed this 5th day of December 2022 at Bloomfield Hills, Michigan.

Elizabeth Moeller
Elizabeth Moeller (Dec 5, 2022 10:14 EST)

Elizabeth Moeller